

<u>STATE OF RI, et al</u>	:	
v	:	Case No.
<u>DONALD TRUMP, et al</u>	:	C.A. No. 25-cv-39-JJM-PAS
	:	

MOTION FOR LEAVE TO FILE *AMICUS CURAE*

1. Rev. Anne Armstrong, Petitioner, moves this Hon. Court for leave to file *amicus*, and outside of normal time, under the federal appellate rules, in the absence of local rules or general civil procedure rules governing the matter. Federal Appellate Rule 29 applies best.
2. In accordance with Rule 29(6), the Court's leave for otherwise **late filing is sought because the relevancy of the proposed brief only emerged in a hearing Friday (one business day ago)**, 21st February, 2025 -- in part due to a wise comment/question by your Honor.
3. In accordance with Rule 29(3)(B), Petitioner herein states that an amicus brief is desirable, and relevant because it asks the Hon. Court to consider highly relevant case law (including this Court's own) which was not raised by the parties, and yet without consideration of which

the case could and likely would end up being decided *per incuriam*. Most importantly, this Hon. Court's own pertinent case law from 2020 was so wise, learned and solution-oriented, it may here point to an outside-the-box solution best benefiting the instant parties and the public interest.

4. The Petitioner's interest, per Rule 29(3)(A) is threefold (and as elaborated upon in the proposed Brief):

A. that of a clergywoman legally familiar to this Hon. Court, from her service as an *in pro persona*, not-infrequent, one-woman federal litigation bulwark against Rhode Island (RI) Executive tyranny -- and to whom this Hon. Court was a friend (and a greatly wise one) even when denying a sought-after injunction in a relevant case, by describing in that case a solution outside of the desired/denied Order.

B. that of a Plaintiff, in separate federal RI District Court complaint against the Rhode Island Attorney General (RIAG) who, as in the instant case (RI et al v Trump et al), ordered a female Assistant Attorney General -- who can be fired without cause -- to represent private and/or third parties who either were not before the Court, and/or to whom representation by the RIAG is not authorized under any statute.

C. that of a Campaign Manager and Treasurer of the RIAG's 2018 election opponent, being prosecuted by the RIAG in a 2018 State matter, after he recused himself, but appointed his own successor 6 years in a row, afoul of general principles of neutrality, SCOTUS case law and State ethics law. It should be noted that the relevant pending criminal

complaint against me referenced a criminal statute that was doctored (adding words to it), by the RIAG's office, dramatically expanding that criminal law's scope beyond what the legislature wrote, an event for which no precedent can be found after Willian Penn's 1670 trial for a similarly fictionalized (expanded *ex post facto*) law.

5. The proposed Brief is attached as **EXHIBIT A: AMICUS BRIEF OF REV. ANNE ARMSTRONG**

Humbly submitted,

Rev. Anne Armstrong

s/Anne Armstrong/

24th February, 2025,

[signature]

[date]

the Feast of St. John Theristus, whose tiny coracle boat sailed straight to the Church, with neither oars nor sail.

*St. John Theristus,
Pray for us!*

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CERTIFICATE OF SERVICE

I, **Rev. Anne Armstrong**, affirm that the above document was on 24th February 2025 electronically served upon all the parties, via counsel, upon filing, by the electronic filing system.

.

Rev. Anne Armstrong

s/Anne Armstrong/

24th February, 2025,

[signature]

[date]

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